

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA**

1) ALEC HAYWARD-PREAUS	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 24-cv-00009-JFH-MTS
	)	
2) SMART FUTURE XPRESS, INC.	)	
3) AMANDEEP SINGH,	)	
	)	
Defendants.	)	

**JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES**

COME NOW, all Parties, by and through their respective counsel of record and hereby file this Joint Motion on behalf of all Parties, and request this Honorable Court to extend all non-expired Scheduling Order deadlines in this matter. In support of this Motion, the Parties would show the Court as follows:

1. On April 8, 2024, this Court entered a Scheduling Order in this matter. *See* Doc. #29.
2. The Court's Scheduling Order set the following remaining deadlines:

Description	Deadline
Exchange of preliminary witness lists and exhibits	9/13/2024
Plaintiff's expert witness list and expert reports	9/13/2024
Defendants' expert witness list and expert reports	9/27/2024
Discovery cutoff	10/11/2024
Settlement Conference requested after	10/11/2024

Motions in limine due	1/10/2025
Deposition/videotaped/interrogatory designations due	1/10/2025
Counter-designations due	1/21/2025
Transcripts annotated with objections and briefs on unusual objections filed due	1/27/2025
Pretrial Disclosure	2/24/2025
Agreed Proposed Pretrial Order, including final witness and exhibit lists with objections	2/10/2025
Requested jury instructions and voir dire	2/24/2025
Trial briefs	2/24/2025
Pretrial conference	To be set by Court
Trial date	To be set by court

3. The parties have continuously conducted discovery in this matter in good faith. They have provided documents and substantive responses. This also includes subpoenas for medical records from other providers, and other subpoenaed records related to driver records and the like.

4. The parties have met and discussed their deposition needs and schedules and are working diligently to come to an agreement on dates.

5. Additionally, the parties are set for private mediation on September 23, 2024.

6. Based on the foregoing and anticipated future discovery needs in this matter, all Parties agree and request that, for the purpose of facilitating and scheduling additional depositions and discovery in this matter, the deadlines in the current Scheduling Order be extended by ninety (90) days to the following dates:

Description	Deadline
Exchange of preliminary witness lists and exhibits	12/12/2024
Plaintiff's expert witness list and expert reports	12/12/2024
Defendants' expert witness list and expert reports	12/26/2024
Discovery cutoff	1/9/2025
Settlement Conference requested after	1/9/2025
Motions in limine due	4/10/2025
Deposition/videotaped/interrogatory designations due	4/10/2025
Counter-designations due	4/21/2025
Transcripts annotated with objections and briefs on unusual objections filed due	4/28/2025
Pretrial Disclosure	5/26/2025
Agreed Proposed Pretrial Order, including final witness and exhibit lists with objections	5/12/2025
Requested jury instructions and voir dire	5/26/2025
Trial briefs	5/26/2025
Pretrial conference	To be set by Court
Trial date	To be set by court

7. The Parties have worked diligently in this matter but agree that additional time is needed in order to fully complete discovery in this matter.

8. All counsel have conferred and agree to the need for the relief sought in the present motion.

9. The Parties have not made any previous requests to extend the Scheduling Order

deadlines in this case.

10. This extension is not sought for the purpose of delay but to provide the Parties sufficient time to complete discovery and to address the Court's remaining deadlines.

11. This Motion is made in the interest of justice and to allow the proper preparation of this case, and not for the purpose of delay or to unduly burden the Court's docket.

12. The granting of this Motion will not cause prejudice to any party hereto nor will it cause any significant change to the Court's docket or delay in the Court's hearing of this matter.

WHEREFORE, the Parties respectfully request this Court to amend certain deadlines as set forth above.

DATED: September 10, 2024.

Respectfully submitted,

/s/ Matthew S. Saint

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